



OFFICIAL PUBLICATION OF THE NATIONAL ALLIANCE OF INDEPENDENT CROP CONSULTANTS

PRESIDENT'S COLUMN



By
Gary Coukell
NAICC
2014 President

Think About NAICC

It seems like just yesterday, and not June, that I discussed in the President's column the late spring and preparations for harvest in the light of being approximately three weeks behind schedule. Although all of our North American members are certainly now into harvest, some of us are just barely there and others have shifted their focus to soil sampling and planting winter crops.

Although there is still an amazing amount of work to complete before the snow flies and the ground freezes in my area, and despite still being in mid-harvest, I do find this time of year to be somewhat slower than the 'heat' of the season. With every crop/field/trial harvested, every report written and every sample shipped, the world feels a little bit lighter and I have a bit more time. Hopefully most of you are also seeing a glimmer at the light at the end of the tunnel and getting a bit of time to think beyond your immediate day-to-day work (and family!) needs.

Whenever things do start to wind down for each of you, I encourage you to think about NAICC; both in terms of how NAICC can serve our members, and how you as an individual can contribute to NAICC. At the 2014 Annual Meeting in New Orleans, I made the statement that

NAICC has a lot of resources to draw from within its membership, and that the more we can draw upon that expertise, the more progress we will make. I also stated that NAICC needs a good team, one comprised of the Board, the Committees, and individual members to achieve our goals.

Nine months into my term as President of NAICC, I believe this to be even more accurate than I thought at the time I made these statements. All of us, the NAICC Board, the Committees members, and all members at large are needed to make progress and drive NAICC forward, just as the vision and dedication of the original founding members did in the beginning.

As things start to wind down for each of you, or if things have not wound down but you have some spare time, please think about NAICC. If you volunteered for a committee this year that has been largely dormant during the busy season, please re-commit yourself and touch base with your fellow committee members to revisit the committee's goals for the year. Although the cropping season is almost over, we still have several months to bring the "NAICC season" down the home stretch to the Annual Meeting.

In addition, if you have not participated on a committee in 2014, please consider doing so in 2015. Debra Keenan, President Elect, will soon be contacting members to chair the committees of NAICC in 2015, but volunteers are more than welcome!

Debra has also been working very hard in conjunction with the annual meeting committee chairs and their committees to develop the program for the 2015 meeting in Reno. Thank you to all of the committee members who have put in a great deal of time in discussing and developing the program. Annual meeting registration information can be found at <http://naicc.org/meetings/2015-annual-meeting/> and the preliminary program will be out soon!

NAICC Committee Volunteer Opportunities

What is the secret of NAICC's success? Two words: Our members! As this Ag season begins to slow down, please consider sharing your talents and skills with Ag peers worldwide in 2015. Simply review the committee listings below, determine the best fit for you, and contact allisonjones@naicc.org.

NAICC Committees:

- Allied Industry
- Annual Meeting Coordination
 - o Consultants Education Subcommittee
 - o Research Education Subcommittee
 - o Quality Assurance Subcommittee
- Certification Board
- Crawfish Boil on the Hill
- Education Outreach
 - o Consultant Subcommittee
 - o RC/GLP Subcommittee
- Ethics and Grievance
- Government Affairs
- International Outreach
- Marketing
- Membership Recruitment, Retention and Rules
 - o Newsletter Subcommittee
- Nominating

Go West, NAICC, Go West!

2015 NAICC Annual Meeting in Reno, Nevada

Yes, it is already time to start planning for the next NAICC Annual Meeting! Our 2015 event will be held in gorgeous Reno, Nevada. Next month's newsletter will feature details on the venue and meeting activities. For now, mark it on your calendar and

bookmark <http://naicc.org/meetings/2015-annual-meeting/> for the latest updates on the meeting. Program and registration forms will be available next month. Exhibitor and sponsorship information can be found at naicc.org.

NAICC Leadership Program Participants Selected

With its mission statement, "To help ensure agricultural sustainability by facilitating the growth of new leaders within NAICC", the NAICC Leadership Program (NAICCLP) develops member leaders to promote NAICC and agriculture in the industry and with key policy-makers and enforcement agencies.

Sponsored in part by the Foundation for Environmental Agriculture Education, FMC Corporation, and AMVAC Chemical Company, the Program is pleased to announce the NAICC Leadership Class of 2014-15:

Laurie Bennett,
Research Consultant,
Bennett Agricultural Research Corporation,
Richland, Iowa.

Laurie is a graduate of Truman University with a Master of Science in Education. She specializes in corn, soybeans, wheat, barley, grain sorghum grasses, alfalfa, soil dissipation, sweet & popcorn, oats, canola and vegetables. A member of NAICC since 2013, Laurie has been affiliated with our organization since 1998 with her husband, David. She has served on the Membership Rules, Retention and Recruitment Committee and was Chairperson of the 2014 Boot Camp Meeting. Laurie also serves as a 4-H leader, Boy Scout leader and as a church board member. Of her desire to participate in the NAICCLP Laurie says, "For many years I attended NAICC as a spouse but always saw the importance of NAICC and understood the value that it brought to our private contract research company. Now having officially joined and served in a variety of roles, I want to take my involvement in NAICC to the next level. I will work hard to give back and continue to help NAICC grow."

Kara Tyler-Julian,
Crop Consultant,
Glades Crop Care Inc.,
Jupiter, Florida.

Kara is a graduate of the University of Florida with a Master of Science in Entomology. She specializes in tomato, potato, pepper, watermelon, squash, eggplant and beans. A member of NAICC since 2014, Kara brings a fresh perspective to the NAICCLP. As she says, "With the advent of smart phones and social media, knowledge and information are exchanged in our current society in an instant. In this modern world the best way to keep pace in one's field is to stay connected with others. That is why I am excited to join the NAICC Leadership Program. I can be a more effective consultant and can share my own knowledge and experiences with others, helping us all become more successful professionals throughout our field."

Paul Squires,
Crop Consultant,
Squires Agricultural Consulting,
Yuba City, California.

Paul is a graduate of Chico State with a Bachelor of Science in Agricultural Business. He specializes in rice, tomato, corn, wheat, alfalfa, sunflower, almond, walnut, beans and melons. Paul is a member of the California Association of Pest Control Advisors, California Rice Marketers, and Farm Credit West. He is also involved with the American Cancer Society. Of his desire to participate in the NAICCLP Paul says, "Leadership is an ability that requires effort, understanding and continued education. I am fortunate to have been a member of Class 37 of the California Agricultural Leadership program. Building on these skill sets through NAICC leadership education is imperative in order to represent my industry and help others improve."

These three exemplary NAICC members will conduct one to two-day field visits with NAICC members within and outside their areas of knowledge and expertise:

- Laurie with Lee and Steve West
- Kara with Blaine Viator, Ph.D. and Grady Coburn, Ph.D.
- Paul with John Hecht and Mark Kottmeyer

The three will also be actively involved in the January Annual Meeting, participating in NAICC committee meetings and workshops, and speaking at the Plenary/Business Session. Please look for them throughout the week and give them hearty congratulations!

Later in the year, Laurie, Kara and Paul will travel with the NAICC Executive Board to Washington to meet with key policy makers. We are fortunate to have this Leadership class representing NAICC.

Nominations Open for Consultant of the Year *Deadline is* **November 30, 2014**

Do you know an NAICC member who has demonstrated exemplary performance this year? Consider nominating him/her for 2014 Consultant of the Year (COTY). Once again, BASF is generously sponsoring the recognition of three NAICC leaders to be honored at the 2015 Annual Meeting. Winners will receive complimentary hotel, airfare and registration!

Nomination forms are available at <http://naicc.org/member-center/forms-applications>. All nominations must be received by November 30, 2014. And yes, you may nominate yourself.



Happenings on the Hill

Updates on Legislation Impacting NAICC Members

By Glenn Luedke, NAICC Legislative
Assistant

FARM BILL

Economists are warning growers to be cautious as they make decisions under the new Farm Bill. A general consensus is that too many “probabilities” exist. The prior Farm Bill contained fixed deficiency payments and were known in advance each year. Under the new Farm Bill, decisions will have to be based on results of the current cropping season.

New decisions facing growers:

1. Decide if base acres should be re-allocated. Growers will have the opportunity to make changes and the changes will be based on the 2007-2009 crop years.
2. Decide if crop acreage should be entered in the Agricultural Risk Coverage (ARC) program of the Price Loss Coverage (PLC) program. The PLC program mirrors the counter-cyclical programs from past years. A target price is used based on county results. If county revenue is less than the guarantee, payments commence. Growers can update payment yields and in 2016, growers will have an option to participate in the Supplemental Coverage Option (SCO) program to provide additional protection. A third option when determining price is to choose the “whole farm option”. Payment is based on guaranteed revenue for the entire farm.

In early August, Ag Secretary Vilsack reported on the status of the Farm Bill for the first six months. He reported that when comparing the new Farm Bill with prior Farm Bills, the new Farm Bill has required massive IT adjustments and is the major cause for delays. In addition, because of certain Congressional mandates, priorities had to change.

Farm Bill fact sheets are available at:

Kansas State University Ag Manager:
FAQ on Title 1 Programs

www.farmdoc.illinois.edu/farbilltoolbox

www.usda.gov/farbill

www.naicc.org

When Can We Fly (Legally)?

By Ben Gielow, AUVSI General Counsel and Senior Government Relations Manager

When will unmanned aircraft be allowed to fly legally in the national airspace? Not soon enough! However, some progress is being made. Here is a quick update of where things currently stand with the Federal Aviation Administration and AUVSI's advocacy efforts.

Two and a half years ago, AUVSI played an instrumental role in advocating for the inclusion of the UAS language in the FAA Modernization and Reform Act of 2012. Since then, we have been working hard to see that language implemented.

Although the FAA can claim credit for meeting some of the requirements in the law (albeit late), such as the selection of the six UAS test sites, commercial activities in the Arctic, and writing a UAS roadmap and comprehensive integration plan, perhaps the most important piece — the rulemaking for small UAS — continues to languish.

The FAA now plans on releasing its Notice of Proposed Rulemaking for small UAS in November (which is almost four years late) for either a 60- or 90-day comment period. The FAA expects it will take at least another 16 months after that to finalize.

So far this year, AUVSI has testified twice before Congress, and our message has been clear — the pace of UAS integration is unacceptable.

The FAA must allow limited commercial UAS activity immediately or risk losing any ability to effectively regulate this burgeoning industry. The FAA does not have the budget or manpower to stop the proliferation of small UAS, and, as an administrative law judge recently ruled in *FAA v. Pirker*, the FAA does not have the legal authority to regulate UAS, because it has never promulgated rules (the FAA is appealing that decision).

We are concerned that as unregulated UAS operations expand, so too does the likelihood of a severe incident. If and when that happens, it could set back this industry. That is why in April, AUVSI led a sign-on letter with 32 other associations, including the Aircraft Owners and Pilots Association, the National Association of Realtors and the National Air Traffic Controllers Association, among others,

implored the FAA to use authority granted by Congress in Section 333 of the FAA law to allow limited UAS operations before a rule is finalized.

We are encouraged the FAA has recently acknowledged looking at Section 333 to grant limited exemptions for certain UAS activities, including for movies, oil and gas, and agriculture. However, this process will still be cumbersome, costly and may take many months. The FAA must do more — and quickly.

Rest assured, AUVSI will continue to advocate on your behalf before Congress and the FAA. Our goal is to get commercial UAS operations ASAP. We welcome your advocacy questions or comments at advocacy@auvsi.org.

Reprinted with permission from the July 2014 AUVSI's Unmanned Systems magazine

Sustaining Membership Renewal

It is NAICC membership renewal season. Look for your packet in the mail. What better way to network with the nation's leading crop and research consultants than to become a Sustaining Member? A variety of membership levels are available. Go to <http://naicc.org/member-center/sustaining/> to see the many ways in which membership has its privileges!

In Memorium

We remember NAICC member Sue Beevers, who passed away on July 8th after battling cancer. Sue worked with California Agricultural Research, Inc., in Kerman, California. She specialized in citrus, cotton, grapes, alfalfa, corn, turf and many other crops. Sue graduated from Stanford University and California State University, Fresno, and taught Special Education for 15 years. She was a founding member of the Folklore Society. She is survived by Mike, her husband of 25 years; daughter Angela; and siblings, Shelley and Chris. A celebration of her life was held on August 2nd.

September 2014

NAICC Welcomes New Sustaining Member, Netafim

Netafim has recently joined the National Alliance of Independent Crop Consultants (NAICC) as a Sustaining Member. Be sure to stop by their booth in Reno and make them feel welcome!

It has been nearly five decades since Netafim first introduced drip irrigation to the world as a solution to one of the world's most urgent problems -- lack of quality water for food production. Today, it is the same pioneering spirit that makes Netafim a global leader in drip irrigation solutions for the agricultural industry. With a sole focus on drip irrigation technologies, Netafim offers the industry's most comprehensive drip irrigation systems, each designed to deliver increased yields while using less water. Consisting of flexible polyethylene tubing with drippers permanently welded to the tubing's inside wall, drip irrigation slowly emits specified amounts of water and nutrients, at low pressure, directly to the plant's root zone.

More than an irrigation method, drip irrigation is a management tool that allows growers to manage crop production, resulting in earlier, more profitable harvests, as well as enhanced consistency and quality in yields from year to year. Energy, water and fertilizer costs are minimized to further improve profitability.

With minimal loss of water to runoff and evaporation – as well as uniform application to plants, drip irrigation is being utilized by increasing numbers of growers for a wide variety of crop applications.

“In joining the NAICC, we aim to extend our commitment beyond our innovative drip irrigation solutions and work hand-in-hand with our partners to raise awareness of the role that drip irrigation plays. We want to make America's corn farmers more profitable and together with them elevate our reach when fighting against scarcity of water, land and food,” said Ze'ev Barylka, Marketing Director for Netafim USA.

As environmental, economic and demographic factors have brought water use to the forefront, Netafim is in a position to leverage their leadership position to drive mass adoption of drip irrigation technology as the path forward.

“While farmers make decisions based on so many variables, such as weather predictability, soil quality, seed selection and others, Netafim will take away any farmers' concerns regarding efficiency in the utilization of the available water and fertilizer, securing maximum yields and crop uniformity” added Barylka.

Scholarship Application Now Available

The NAICC's Foundation for Environmental Agriculture Education (FEAE) will provide a \$3,000 scholarship to a deserving college student in Agriculture with a major in Crop Production or an allied subject. The Richard Jensen Scholarship is a tribute to one of the NAICC's early leaders.

Completed applications are due by November 1, 2014. Applicants must meet the following requirements:

1. Pursuing a four-year degree in a major or discipline closely aligned to crop production such as Soil Sciences, Agronomy, Entomology, Horticulture, Plant Pathology, Weed Science, Contract Ag Research, or pursuing a Doctorate in Plant Medicine.
2. Completed a minimum of one year toward a four-year degree
3. Presently enrolled in the discipline of studies cited in item 1.
4. Submits a packet to the Review Board that includes: (THESE ARE IN ADDITION TO THE APPLICATION)
 - a. Application
 - b. Transcripts
 - c. Work History
 - d. Reason scholarship is desired
 - e. Résumé
 - f. Proof of enrollment in college/university
5. Two letters of reference attached, or mailed separately.

The winner will be notified in late November and the scholarship check will be awarded upon presentation of verified registration for the fall term.

Go to <http://thefae.org/jensen-scholarship> for full details.

Friends of the Foundation *Consider a Gift to the FEAE*

As we look forward to the 2015 NAICC Annual Meeting, please remember your board and executive board of The Foundation for Environmental Agricultural Education (FEAE). Once again they will be organizing a fantastic raffle and silent auction for a good cause.

The FEAE also sponsors “Friends of the Foundation” to help with member education and professional development, and fund the Jensen Scholarship Program. All donations are welcomed and appreciated! For a gift of \$250, you will become (or maintain) a membership in “Friends of the Foundation,” and will receive a

special ribbon on your Annual Meeting name tag to recognize your commitment to the mission and goals of FEAE.

Please consider becoming a Friend at <http://naicc.org/foundations/feae/>.

The Foundation for Environmental Agricultural Education (FEAE) was established in 1991 by the NAICC, as a 501(c)(3) foundation.

QA Corner: Regulatory Updates

By Dr. Stu Mertz, PEAK Quality Consulting, Inc.

GAO Report

<http://www.gao.gov/products/GAO-14-289> "Improvements Needed in EPA's Good Laboratory Practices Inspection Program" GAO-14-289: Published: May 15, 2014. Publicly released on June 16, 2014, 53 pages. Highlights are: "GAO recommends, among other things, that EPA assess its authority and need for a fee-based inspection system for the GLP Program, determine why the database information to prioritize laboratories is incomplete, and that EPA and FDA develop a process to collaborate and share information on planned and completed inspections. EPA and FDA agreed with GAO's recommendations." It will take several years to implement and no timetable has been released. There were four recommendations for Executive Action:

1. "In addition, the EPA Administrator and the FDA Commissioner should develop a formal written agreement, such as a memorandum of understanding, that outlines how the two agencies plan to regularly collaborate and share information on GLP inspections and avoid duplication of inspections so that EPA can more efficiently use its limited resources.
2. To improve the OECA GLP inspection process, the EPA Administrator should assess the authority and need for a fee-based inspection system, and if such a system is warranted, establish a user fee system, seeking additional legislative authority, if necessary, to make the laboratory inspection program self-sustaining.
3. To improve the OECA GLP inspection process, the EPA Administrator should direct OECA and OPP to ascertain the exact causes of inaccurate and incomplete data in its databases and take action to ensure that the data, such as identification of performing laboratories and inspection history, are accurately recorded.
4. To improve the OECA GLP inspection process, the EPA Administrator should direct OECA and OPP to develop documented procedures to coordinate and prioritize laboratories for inspections."

EPA GLP Workshop

www.go.ncsu.edu/glp Go to this website for information about the next excellent EPA's Workshop on GLPs that is taught by Frances Liem, Dan Myers, and Mark Lehr, the date/location of which has not yet been scheduled. Unfortunately the one to be held in Pleasanton, CA in October 2013 (hosted by NC State University) was canceled due to the government shutdown, and none was scheduled during 2014.

www.naicc.org

Additional Regulatory Update Information from the SQA 2014 Annual Meeting

Francisca Liem, Director GLP Program, presented an "EPA GLP Regulatory Update" on April 10, 2014 at the Society of Quality Assurance (SQA) national meeting. Many research and QA members of NAICC do not belong to SQA. This review article reports additional important information that was not presented at the earlier NAICC annual meeting. Please refer to June 2014 NAICC Newsletter for NAICC EPA GLP Regulatory Update.

Also discussed below are two issues presented by F. Liem that generated much discussion. This reporter, as a member and active in a new EPA Subcommittee of the GLP Specialty Section of SQA (chairperson Carol Lee, QA Manager, JFR America), undertook a dialog with F. Liem in order to better understand and clarify the EPA findings and recommended action for these issues. This subcommittee is also studying how to better the relationship between NAICC and SQA (Carrie Logan is the NAICC liaison to SQA).

Excerpts from SQA's EPA GLP Regulatory Update (FY2013)

Most Frequent GLP Deviations: Subpart B, Organization & Personnel

1. Lack of QAU
2. Lack of test facility management
3. Lab SOPs written by QA
4. Result of testing was not reported
5. QA inspection report sent to management
6. Protocol amendment not issued
7. Final report does not reflect raw data
8. QA responsible for master schedule (see Issue #1 below)
9. Inadequate QA coverage

Subpart G, Protocol

1. Lack of initials and dates on data entries
2. Lack of protocol
3. Protocol amendment not issued
4. Protocol not signed and dated by study director
5. Sponsor not notified of protocol deviation
6. Lack of accountability records for test system
7. Lack of confirmation of test system
8. Raw data recorded on sheets of paper and destroyed

Subpart J, Records & Reports

1. Lack of method description in final report
2. Test conditions not reported
3. Consultant claimed to be a performing laboratory
4. Test facility was not identified as performing laboratory
5. Testing facility misidentified in final report
6. Result of testing was not reported
7. Final report does not reflect raw data
8. Raw data not retained according to GLP

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September 2014

QA Corner

Continued from page 5.

Additional GLP Alert (for other GLP Alerts, see June 2014 NAICC Newsletter) August 19, 2013 –EPA signed a Letter of Intent with China Ministry of Agriculture/Institute for the Control of Agrochemicals (ICAMA) to mutually recognize each other's GLP program upon completion and confirmation of certain criteria.

If you have a question about this or any other GLP Alert or regulatory item, please contact Francisca Liem. Liem. francisca@epa.gov or Tel 202.564.2365

GLP Issue No. 1 (FY2013)

REF: Most Frequent GLP Deviations, Subpart B (see above)

8. **QA** responsible for master schedule Finding. Example of EPA's GLP deviation regarding the Master Schedule for conflict of interest: Testing Facility/Test Site **QAU** per SOP was found to have been assigned by management the responsibility to both maintain and periodically audit the Master Schedule (MS). However, the individual assigned to maintain the MS (i.e., entered data into the MS and also periodically printed out and initialed/dated the official quarterly copy of the MS found in the archive) was also the same individual who conducted the quarterly audit of the MS and issued the audit report that was found in the archive.

EPA's interpretation: **QA** cannot be responsible for maintaining the MS. The MS is a tool for management and management has responsibility for the MS. **QA** being responsible for the MS is a conflict of interest if **QA** both maintains

the MS and then also audits the MS (e.g., during a protocol review or in-life inspection; or a periodic audit required by a facility SOP). The GLP deviation is that **QA** cannot audit its own work (i.e., entries made into a MS).

Discussion: **QAU** historically maintains the MS at many companies. For examples, MS requirements are in the **QA** section of the GLPS; and management assigning **QAU** this function is very efficient and provides high quality documentation for companies that have many departments and conduct many GLP studies. In contrast, in many small field site companies Management or the Principal Investigator maintains the MS. The EPA-observed finding cited above is analogous to the same potential conflict of interest matter that EPA raised in the recent past with management assigning the **QAU** to be the Archivist who then audits the Archives. An EPA-accepted resolution for the Archive was: if management assigns **QAU** to function as archivist and backup archivist, EPA wants to see that a separate **QA** (e.g., outside **QA** contractor or a member of the **QAU** that has no responsibility for this activity) conduct the periodic audit of the Archive. This same solution appears to be applicable to the MS deviation issue as well.

GLP Issue No. 2 (FY2013)

GLP Alert (Alert 1 at the NAICC meeting and Alert 2 at SQA meeting)

- Date of completion of study = date final report is signed by study director (Definition)
- Date of completion of study does not

change when the final report is amended (EPA's interpretation).

For ease of discussion, consider amended final reports typically arising from two different situations:

Situation A: an item(s) in the final report needs to be corrected, clarified, or some existing raw data was inadvertently omitted. Here no new raw data was generated after the original study completion date.

In discussion with F. Liem, she stated that the GLP Alert was directed only at situation A.

Situation B: a completed study was reopened (e.g., with new protocol amendment) and new experimental work was performed after the original study completion date. Because a study can have only one final report and if the EPA directs that all the work be in one report (instead of two separate submissions), the original final report was amended to incorporate the new data and interpretation.

In situation B, it would be a misrepresentation of the facts to state that the study completion date was the original date.

F. Liem agreed that a good solution for situation B would be to note both the original completion date and the amended completion date on the report title page and in the body of the report. Some sponsors further clarify this situation by describing that additional work was performed in a new GLP Compliance Statement, and of course there are additional audits in a new **QA** Statement.



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